U.S. Department of Justice

United States Attorney
Southern District of New York

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The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

August 21, 2024

[handwritten: 8/22/24 The gov't shall respond to defs' post trial motions by September 18, 2024. So ordered. Sidney H Stein U.S.D.J.]

By ECF

The Honorable Sidney H. Stein
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

> Re: *United States v. Robert Menendez, et al.,*
>   S4 23 Cr. 490 (SHS)

Dear Judge Stein:

   The Government respectfully writes in the above-captioned matter to request that the Court permit the Government to file its response to the post-trial motions filed by defendants Robert Menendez, Wael Hana, and Fred Daibes on September 23, 2024.

   On July 16, 2024, the jury returned a guilty verdict against the defendants on all counts. Counsel for Hana requested additional time to file post-trial motions, citing the "length of the trial" and "the complication of the record." (July 16, 2024 Tr. at 7214.) With the Government's consent, the Court extended the 14-day limit set forth in Federal Rules of Criminal Procedure 29 and 33 for the defendants to file post-trial motions until August 19, 2024, which was 34 days after the verdict. (*Id.* at 7215.) On August 19, 2024, the defendants filed over 300 pages of post-trial motions. (*See* Dkts. 590, 592, 593.)

   Accordingly, the Government requests the same period of time to respond to the defendant's motions, that is, until September 23, 2024, which is sufficiently in advance of the October 29, 2024 sentencing proceedings.

Honorable Sidney H. Stein
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Respectfully submitted,

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cc: (by ECF)

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